August 14, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122
Reply Comments of The SPACECONNECTION, Inc.

Dear Ms. Dortch:

The SPACECONNECTION, Inc. ("The SPACECONNECTION") writes to express its agreement with comments filed by various content distributors in response to the Commission's July 19 Public Notice in the above referenced docket.[1] The SPACECONNECTION relies on the highly reliable, extremely cost-effective C-band satellite service upon which video and audio content has been delivered in the United States for the past several decades. Put simply, the ACA Connects Coalition proposal is unworkable and would harm our business.

Timing. The SPACECONNECTION agrees with the Content Companies that the ACA Connects Coalition proposal "speculates, wrongly, that the Commission could, via regulatory mandate, overhaul the distribution of video programming in the United States from a satellite-based system to one that relies almost exclusively on fiber—and for the most part in a mere '18 to 36 months.'"[2] As an initial matter, today, fiber is a limited component of the video distribution ecosystem in the U.S. Outfitting our facilities, data centers and cable headends with the required equipment is a considerable amount of effort that requires design, deployment and testing before it can be commissioned for service. Agreements will need to be put in place to ensure protection of our valuable content. Then there is the issue of deploying the fiber itself. Even in urban areas, the assertion that all urban cable headends could be moved off satellite and onto fiber in 18 months is, in our experience, too aggressive and not realistic. Indeed, in some cities, it can take more than 18 months to get the permits and rights of way required to lay fiber to cable headends where it is not currently available or where diverse and redundant fiber paths are not yet provided. Further, as the C-Band Alliance has noted, there would need to be an extensive testing period for each fiber connection before utilization of satellite service could cease in order to ensure that the fiber configuration is providing the quality and reliability that we would require. Additionally, our understanding is that the transmission from the wireless base stations do not stop at the urban boundaries and can extend tens of kilometers and even as much as 100 kilometers. As such, "adjacent" headends up to 100 kilometers from an urban center,

[1] *Wireless Telecommunications Bureau, International Bureau, Office of Engineering and Technology, and Office of Economics and Analytics Seek Focused Additional Comments in 3.7-4.2 GHZ Band Proceeding*, Public Notice, GN Docket No. 18-122, DA 19-678 (rel. July 19, 2019).
[2] Comments of the Content Companies, GN Docket No. 18-122 at 2 (Aug. 7, 2019).

likely numbering in the many hundreds, will also need to be connected via fiber. Many of these headends are likely in rural areas. Given all of these elements, we find it virtually impossible to see an urban fiber solution for headends in less than 5 years, let alone 18-36 months.

Service Quality. With regard to reliability, The SPACECONNECTION further agrees with the Content Companies that the "reduction in reliability" from C-band satellite distribution to fiber "would be completely unacceptable for video content delivery services that reach millions of consumers at the same time."[3] It appears to us that under the ACA Connects Coalition proposal, our content would be riding on hundreds of individual point-to-point fiber connections instead of a single, integrated, and highly reliable C-Band network solution.

Transition Accountability. Under the ACA Connects Coalition proposal, it is not clear to us who would be responsible for managing the process of transitioning what could easily be hundreds of individually-owned cable headends in the urban areas from satellite to fiber. For example, who will be accountable for ensuring that the nationwide fiber roll out is accomplished in a coordinated timeframe? Without full attention to that, we could be forced to operate two separate networks indefinitely. Will additional burdens be placed on programmers and broadcasters, such as filing progress reports with the FCC reporting on each of our urban distribution points – or will such progress reports be required of some other party? And, importantly, the C-Band Alliance has put on the record a contractual commitment regarding the scheduling, ongoing availability and reliability of our total network.[4] Who will be making that commitment in a fiber environment? These are critical questions that the Commission would need to answer before it adopts any plan that relies on fiber as a means of clearing C-band spectrum in any geographical area.

Increased Costs. The SPACECONNECTION agrees with LinkUp Communications that the ACA Connects Coalition proposal will result in increased costs to content distributors.[5] Even if, as the ACA Connects Coalition proposal suggests, initial fiber costs will be paid for by auction revenues, that does not eliminate the financial burden to The SPACECONNECTION of having to rely, at least in part, on a fiber distribution system, which would result in increased operations and staffing costs beyond the costs we incur today. The reason The SPACECONNECTION uses C-band is because it is extremely cost-efficient. We do not want to have to incur additional expenses and hire additional staff as a result of being forced to use fiber in addition to satellite for at least three – and quite possibly more -- years. Such additional costs could threaten the financial viability of The SPACECONNECTION, a business that has been successfully serving the broadcast, media and cable industries for the past 33 years.

No Additional Satellites. As the Commission is aware, CBA members have committed publicly to launching new satellites to ensure that they have the same total on-orbit capacity to carry video and other services in 300 MHz of spectrum that they carry today with 500 MHz.[6] And the

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[3] *Id.* at 6.
[4] Letter from Henry Gola, Counsel for the C-Band Alliance, GN Dkt. No. 18-122 (Apr. 3, 2019).
[5] Comments of LinkUp Communications, GN Docket No. 18-122 at 3 (Aug. 7, 2019).
[6] *See, e.g.*, Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, GN Dkt. No. 18-122 (Feb. 7, 2019).

CBA has asserted that these new satellites will be needed in order to clear the 200 MHz in 36 months.[7] Under the ACA Connects Coalition proposal, these satellites would not be built and launched in order to clear 370 MHz in 36 months. Yet the proposal ignores the fact that any plan that requires satellite-delivered content to move from one frequency (or satellite) to another must allow for up to three months of dual illumination to ensure all earth stations are properly pointed and tuned. Dual illumination means that twice the satellite capacity is needed to deliver the same content during the relevant period. The ACA Connects Coalition proposal's assumption that 370 MHz can be cleared in 36 months without new satellites being built is simply false, and this miscalculation renders the proposal's 'estimated', but not committed timetable, without credibility.

From the beginning of the FCC's C-band inquiry, programmers and broadcasters have sought certainty regarding the operating environments for our businesses. The SPACECONNECTION agrees with the Content Companies that the proposal advocated by the C-Band Alliance is the only one that preserves the reliability of the existing C-band distribution system.[8] The SPACECONNECTION therefore urges the Commission to adopt the C-Band Alliance proposal.

Respectfully submitted,

/s/ Jonathan Crawford
Jonathan Crawford
President & CEO
The SPACECONNECTION, Inc.
225 South Lake Ave., Suite 300
Pasadena, CA 91101

[7] *See* Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, GN Dkt No. 18-122 (Apr. 9, 2019), Attachment at 6.
[8] Comments of the Content Companies at 15.